

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Kimberly Wright

NO., 18-00373HWY

Debtor

Chapter 13

Charles J. DeHart, III Esq.
Trustee

vs.

Wilmington Savings Fund Society, FSB,
D/B/A Christiana Trust, not individually
but as trustee for Pretium Mortgage
Acquisition trust is 120 So. 6th st.,
Suite 2100, Minneapolis, MN 55402

Movant

FILED
HARRISBURG, PA
2019 SEP 17 AM 9:39
CLERK
U.S. BANKRUPTCY COURT

MOTION FOR CONTINUANCE

PLEASE TAKE NOTICE THAT on September 25, 2019 at 9:30 a.m on soon thereafter as the matter of the Court by ex-parte application for an Order granting a continuance of a new Hearing date for a period of 21 days pursuant to Pennsylvania Rule 216 of Court on the grounds:

The request for a continuance under Rule 216

(1) Such documents will be absent because of facts arising subsequent to the service of the hearing and which would be a proper ground for continuance under the provisions of Rule 216(A);

(2) Defendant's, Kimberly Wright excused inability to obtain essential documents, or other material evidence despite diligent efforts; or

(3) A significant, unanticipated change in the status of the case as a result of which the case is not ready for trial set on the date of September 25, 2019. The defendant, Kimberly Wright has requested a Motion for Continuance to gather and receive additional information regarding payment history from plaintiff, Wilmington Savings Fund Society, FSB, D/B/A Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition trust.

I affirm under the penalty of perjury that the foregoing is true and correct to the best of my information and belief.

K. Wright

KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402

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**CERTIFICATE OF SERVICE OF NOTICE OF
MOTION FOR CONTINUANCE**

I hereby certify that a copy was sent by first class mail, postage pre-paid, and/or electronic means, upon the following on the date listed below:

KML LAW GROUP, P.C.
James C. Warmbrodt, Esq.
701 Market Street, Suite 5000
Philadelphia, PA 19106
Attorney for Movant/Applicant

Charles J. DeHart, III Esq.
8125 Adams Drive, Ste A
Hummelstown, PA 17036

Wilmington Savings Fund Society, FSB,
D/B/A Christiana Trust, not individually
but as trustee for Pretium Mortgage
Acquisition trust is 120 So. 6th st.,
Suite 2100, Minneapolis, MN 55402.

Method of Service: electronic means or first class mail to all parties listed.

KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402